

Vialonga references. Without that, there is no possible *prima facie* case of obviousness because the claimed signal is missing and the claimed response to such a signal is also missing.

The Examiner suggests that the *Vialonga* reference discloses generating a pit access control signal. Applicant respectfully disagrees. The access switches 30A, 30B in the *Vialonga* reference are used for providing a signal that a technician desires access to a selected elevator cab at a particular landing. A cab access signal is not the same thing as a pit access control signal. Without the latter, there is no possible *prima facie* case of obviousness.

Additionally, the Examiner contends that the *Vialonga* reference teaches automatically moving an elevator car to a predetermined parking position responsive to a pit access control signal. Applicant respectfully disagrees. There is no such movement in the *Vialonga* reference. The movement that the Examiner relies on occurs after an elevator cab is brought to the landing at which the technician desires access to it. A technician may use an access key switch for manually indicating a desired movement of the elevator car in an inspection mode. As described in column 2, lines 31 – 35, the technician is allowed to adjust the position of the cab within the hoistway by generating signals indicating a desire to move the cab up or down. That does not constitute a pit access control signal nor is there any automatic movement to a predetermined parking position responsive to such a signal. The movement of the car in response to such a signal is not predetermined but, instead, is governed by the technician's use of the access key switch. Therefore, it is not possible to find an automatic movement of an elevator car to a predetermined parking position responsive to a pit access control signal in the *Vialonga* reference.

There is no predetermined parking position in the *Vialonga* reference because the technician provides a signal to move the car up or down. That signal does not indicate a predetermined parking position.

Further, it is not possible for the Examiner to use the limit switches from the *Sansevero* reference to establish a predetermined parking position. Those limit switches do not have any particular correspondence to *Vialonga*'s signals for moving a car up and down. There is no teaching, for example, that use of an up or down signal in the *Vialonga* reference would move a car to a position where *Sansevero*'s limit switches would be used to prevent further movement of the car. There is no predetermined parking position in the proposed combination of references.

If even one of the features of Applicant's claims were missing from the proposed combination, there would be no *prima facie* case of obviousness. In this case there are several features that are completely missing and, therefore, the rejection must be withdrawn.

**The rejection of claims 2-3 and 9
under 35 U.S.C. §103 should be withdrawn.**

The rejection of these claims is based upon the same proposed combination of the *Sansevero* and *Vialonga* references. The Examiner proposes to add teachings from the *Conchello* reference for purposes of rejecting claims 2-3 and 9. Even if the *Conchello* reference were added to the proposed combination, there still is nothing corresponding to a pit access control signal or automatic movement of an elevator car to a predetermined parking

position responsive to such a signal. Therefore, there is no possible *prima facie* case of obviousness. The rejection should be withdrawn.

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